

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARTIN COHEN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LUCKIN COFFEE INC., JENNY ZHIYA
QIAN, and REINOUT HENDRIK SCHAKEL,

Defendants.

Case No. 1:20-cv-01293-LJL

CLASS ACTION

ORAL ARGUMENT REQUESTED

WAI CHUN SHEK, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LUCKIN COFFEE INC., JENNY ZHIY A
QIAN, CHARLES ZHENG YAO LU,
REINOUT HENDRIK SCHAKEL, JINYI
GUO, JIAN LIU, HUI LI, ERHAI LIU,
CREDIT SUISSE SECURITIES (USA) LLC,
MORGAN STANLEY & CO. LLC, CHINA
INTERNATIONAL CAP IT AL
CORPORATION HONG KONG
SECURITIES LIMITED, HAITONG
INTERNATIONAL SECURITIES
COMPANY LIMITED, KEYBANC
CAPITAL MARKETS INC., AND
NEEDHAM & COMPANY, LLC,

Defendants.

Case No. 1:20-cv-02977-NRB

CLASS ACTION

ORAL ARGUMENT REQUESTED

**DECLARATION OF FRANCIS P. MCCONVILLE IN SUPPORT OF MOTION OF
CHESI ASSETS LIMITED GROUP FOR APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF SELECTION OF LEAD COUNSEL**

I, Francis P. McConville, declare as follows:

I am a member in good standing of the bar of the State of New York and am admitted to practice before this Court. I am a Partner at the law firm of Labaton Sucharow LLP (“Labaton Sucharow”), proposed Lead Counsel for the Class. I submit this declaration in support of the motion filed by proposed Lead Plaintiff Chesi Assets Limited and Interactive Digital Finance Limited (together, “Chesi Assets Limited Group”) for the entry of an Order: (i) consolidating the above captioned actions; (ii) appointing Chesi Assets Limited Group as Lead Plaintiff; (iii) approving Chesi Assets Limited Group’s selection of Labaton Sucharow as Lead Counsel for the Class; and (iv) granting such other and further relief as the Court may deem just and proper.

Attached hereto as Exhibits A through E are true and correct copies of the following documents:

EXHIBIT A: Signed Certification of Chesi Assets Limited Group members, pursuant to the requirements of the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(2);

EXHIBIT B: Loss analysis for Chesi Assets Limited Group;

EXHIBIT C: Notice of pendency of *Cohen v. Luckin Coffee*, 1:20-cv-01293-LJM, (S.D.N.Y. February 13, 2020);

EXHIBIT D: Notice of pendency of *Sterckx v. Luckin Coffee Inc.*, 1:20-cv-01677 (E.D.N.Y., April 2, 2020);

EXHIBIT E: Firm Resume of Labaton Sucharow.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

DATED: April 13, 2020

Respectfully submitted,

/s/ Francis P. McConville

LABATON SUCHAROW LLP

Francis P. McConville

140 Broadway

New York, New York 10005

Telephone: (212) 907-0700

Facsimile: (212) 818-0477

fmcconville@labaton